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7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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10 Cyrus Hazari,

11 Plaintiff,

12 v.

13 Superior Court of Santa Clara County State of
California, et al. and DOES 1-100,

14 Defendants.

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16 Case No. 21-CV-04262 JSW
**DEFENDANT MANDY BRADY'S
RESPONSE TO ORDER TO SHOW
CAUSE**
Re: Dkt. Nos. 49, 51.

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Defendant Mandy Brady responds to the Court's Order to Show Cause issued December 22, 2021 as follows:

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Exhibit A to Ms. Brady's Declaration filed on December 21, 2021 was previously produced in the underlying action, *Hazari v. Brady*, Santa Clara County Superior Court Case No. 16CV295730, pursuant to a subpoena directed to Dr. Dagmar Horvath, who has offered opinions in this action regarding Mr. Hazari's medical condition. Mr. Hazari did not object to the production of those records in the underlying Superior Court action in which he placed his medical condition and supposed exacerbation of multiple sclerosis by Ms. Brady directly in issue, nor did Mr. Hazari assert any privacy concerns or request that the medical documentation contained in Exhibit A be sealed if included in any court filing.

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1 Notwithstanding the aforementioned, Ms. Brady does not oppose the sealing of Exhibit A
2 to her Declaration, provided its contents will be considered by this Court.

3 Dated: December 23, 2021

MESSNER REEVES LLP

4 By: 
5 JULIAN PARDO DE ZELA

6 Attorneys for Defendant MANDY BRADY

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PROOF OF SERVICE

**Hazari v. Superior Court, et al.
Case No. 21-cv-04262 JSW**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Santa Clara, State of California. My business address is 160 W. Santa Clara Street, Suite 1000, San Jose, CA 95113.

On December 23, 2021, I served true copies of the following document(s) described as
DEFENDANT MANDY BRADY'S RESPONSE TO ORDER TO SHOW CAUSE on the
interested parties in this action as follows:

10 | Cyrus Hazari Plaintiff In Pro Per
11 | 15209 Blue Gum Court
| Saratoga, CA 95070
| Telephone/Fax: (408) 766-7471
| Email: cyrus@metafusion.net

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Messner Reeves LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at San Jose, California.

17 BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the
document(s) to be sent from e-mail address jtimbol@messner.com to the persons at the e-mail
addresses listed in the Service List. I did not receive, within a reasonable time after the
transmission, any electronic message or other indication that the transmission was unsuccessful.
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I declare under penalty of perjury under the laws of the United States of America that the
foregoing is true and correct and that I am employed in the office of a member of the bar of this
Court at whose direction the service was made.

Executed on December 23, 2021, at San Jose, California.

Jennifer K. Timbol